

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CLEMENT WOGHIREN,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04-12148 WGY
)	
WYETH and WYETH BIOPHARMA,)	
)	
Defendants.)	
)	

PLAINTIFF CLEMENT WOGHIREN'S PROPOSED SPECIAL VERDICT FORM

The Plaintiff Clement Woghiren hereby submits his proposed special verdict form. Dr. Woghiren reserves the right to supplement and revise this propose special verdict form after the close of evidence.

Respectfully Submitted,

Clement Woghiren

By his attorneys,

/S/ John F. Tocci

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Dated: September 30, 2005

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CLEMENT WOGHIREN,

Plaintiff,

V.

WYETH and WYETH BIOPHARMA,

Defendants.

CIVIL ACTION NO. 04-12148 WGY

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1. Did Clement Woghiren prove that the Defendant Wyeth discriminated against him in taking an adverse employment action against him?

 Yes

 No

2. Did Clement Woghiren prove that the Defendant Wyeth retaliated against him because of his filing a Charge of Discrimination with the Massachusetts Commission Against Discrimination or by filing this litigation?

Yes

No

If you answered “yes” to question one or two, proceed to question 3. If you answered this question “no,” please go to the end of this form, sign it, and inform the court officer that your jury deliberations are completed.

3. If you answered “yes” to question 1 or 2, write out in words the damages which you find that Wyeth should pay for its discriminatory or retaliatory conduct, for:

(a) back pay:

(b) emotional distress:

4. If you answered "yes" to question 1 or 2, do you find that Wyeth's discriminatory or retaliatory conduct was outrageous because of the Defendant's evil motive or reckless indifference to the rights of others?

_____ Yes

_____ No

5. If you answered "yes" to question 4, write out in words the damages you find are appropriate to punish the Defendant Wyeth for the outrageous conduct or to deter similar behavior in the future:

punitive damages:

Please inform the court officer that your jury deliberations are completed.

The foregoing answers are sworn to by at least ten of us in each instance.

Date: _____

(Signature of Foreperson)